## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

| IN RE: HAIR RELAXER<br>MARKETING, SALES PRACTICES,<br>AND PRODUCTS LIABILITY<br>LITIGATION   | MDL No. 3060<br>Master Docket Case No. 1:23-cv-00818<br>Honorable Mary M. Rowland                                     |  |
|--|---|--|
| v.  Dudley Beauty Corp., LLC f/k/a Dudley Products, Inc.   | SHORT-FORM COMPLAINT AND JURY DEMAND  Civil Action No. 1:25-cv-05610  |  |
| 1. Plaintiff(s)/Injured Party/Decedent reference Plaintiffs' Master Long Form Complete Practices and Products Liability Litigation, MD Number 106. | G   |  |
| 2. Plaintiff(s), Janice Brown-Woods  | , file(s) this Complaint pursuant to CMO  |  |
| No. 2 and is to be bound by the rights, protection   | ons and privileges, and obligations of that CMO   |  |
| and other Orders of the Court. Further, in acc   | cordance with CMO No. 2, Plaintiff(s) hereby  |  |
| designate(s) the United States District Court f  | for the Northern District of Texas as   |  |
| Plaintiff's designated venue ("Original Venue  | e"). Plaintiff makes this selection based upon  |  |
| one (or more) of the following factors (please cl  | heck the appropriate box(es)):  |  |
| ✓ Plaintiff currently resides in Garland   | , Texas (City/State);   |  |
| Plaintiff purchased and used Defend (City/State);  | dant(s)' products in  |  |
| <u> </u>   | district in which Defendant <u>currently</u> resides, and all e in which the district is located (28 U.S.C. § 1391(b) |  |

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|       |    | The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)):  |
|-------|----|---|
|       |    | There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)). |
|       |    | Other reason (please explain):  |
|       | 3. | For purposes of diversity jurisdiction, Plaintiff is a citizen of   |
| Texas |    | (State/Territory).  |

4. Plaintiff is suing the following Defendants, and for purposes of diversity, whose State of Incorporation/Formation and Principal Place of Business is as follows:

| Check All<br>Applicable<br>Defendants | Defendant   | State of Incorporation or Formation | Principal Place<br>of<br>Business |
|---------------------------------------|---|-------------------------------------|-----------------------------------|
|                                       | AFAM Concept, Inc. d/b/a JF Labs, Inc.                    | Illinois                            | Illinois                          |
|                                       | Avlon Industries  | Illinois                            | Illinois                          |
|                                       | Beauty Bell Enterprises LLC f/k/a House of Cheatham, Inc. | Georgia                             | Georgia                           |
|                                       | Dabur International Ltd.                                  | Isle of Man                         | Dubai                             |
|                                       | Dabur International USA Ltd.                              | India                               | Illinois                          |
|                                       | Dermoviva Skin Essentials, Inc.                           | Delaware                            | New Jersey                        |
|                                       | Godrej SON Holdings, Inc.                                 | Georgia                             | Georgia                           |
|                                       | House of Cheatham LLC                                     | Delaware                            | Georgia                           |
|                                       | L'Oréal USA, Inc.   | Delaware                            | New York                          |
|                                       | L'Oréal USA Products, Inc.                                | Delaware                            | New York                          |
|                                       | Luster Products, Inc.                                     | Illinois                            | Illinois                          |
|                                       | McBride Research Laboratories, Inc.                       | Georgia                             | Georgia                           |

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| Check All Applicable Defendants | Defendant  | State of Incorporation or Formation | Principal Place<br>of<br>Business |
|---------------------------------|--|-------------------------------------|-----------------------------------|
|                                 | Namaste Laboratories LLC   | Illinois                            | Illinois                          |
|                                 | Revlon Consumer Products Corporation   | Delaware                            | New York                          |
|                                 | Revlon Group Holdings LLC  | Delaware                            | Delaware                          |
|                                 | Revlon, Inc.   | Delaware                            | New York                          |
|                                 | SoftSheen-Carson LLC   | New York                            | New York                          |
|                                 | Strength of Nature, LLC  | Georgia                             | Georgia                           |
| <b>V</b>                        | Other (Please identify):  Dudley Beauty Corp., LLC f/k/a Dudley Products, Inc. | North Carolina                      | North Carolina                    |
|                                 | Other (Please identify):   |                                     |                                   |

| Check All<br>Applicable<br>Defendants | Defendant   | State of<br>Incorporation<br>or Formation | Principal Place<br>of<br>Business |
|---------------------------------------|---|---|-----------------------------------|
|                                       | Other (Please identify):                                |   |                                   |
|                                       |   |   |                                   |
|                                       | CASE SPECIFIC FACTS REGA<br>HAIR RELAXER PRODUCT USE AN |   |                                   |
| 5.                                    | Upon information and belief, Plaintiff began using      | hair relaxer produc                       | t(s) on or                        |
| about the follow                      | ing date 1975 and if applicable, stop                   | oped using hair rela                      | xer                               |

| about the following date 1973 and if applicable, stopped using hair relaxer                       |
|---|
| product(s) on or about the following date: 2023.  |
| 6. Upon information and belief, Plaintiff used the following hair relaxer product(s)              |
| which Plaintiff contends caused and/or contributed to their injury(ies) and brings claims against |
| the following Defendants:   |
|   |

| Defendant           | Product List (Select All Applicable Products)                         |
|---------------------|---|
| AFAM Concept, Inc.  | Hawaiian Silky - Crème Conditioning No Lye Silky Smooth Sheen         |
| d/b/a JF Labs, Inc. | Relaxer   |
|                     | Hawaiian Silky - Herbal No Lye Conditioning Relaxer System with Tea   |
|                     | Tree & Avocado Oil - 2 Applications                                   |
|                     | ☐ Vitale - Olive Oil Anti-Breakage Relaxer No Base with Shea Butter - |
|                     | Regular Strength  |

| Defendant   | Product List (Select All Applicable Products)   |
|---|---|
| AFAM Concept, Inc.<br>d/b/a JF Labs, Inc.                           | <ul> <li>□ Vitale Pro - New Texture Salon Exclusive Hair Relaxer</li> <li>□ Vitale Mo'Body - Shea Butter Sensitive Scalp Relaxer with Oatmeal Protein</li> <li>□ Vitale - Life and Body - Hair Relaxer with Aloe Vera - Smooth Silky Texture</li> <li>□ Other (please specify):</li> </ul>  |
| Avlon Industries, Inc.  | ☐ Affirm Crème Relaxer ☐ Affirm Sensitive Scalp Relaxer ☐ Affirm Dry & Itchy Scalp Relaxer ☐ Affirm FiberGuard Conditioning Crème Relaxer ☐ Affirm FiberGuard Sensitive Scalp Conditioning Relaxer ☐ Other (please specify):  |
| Beauty Bell Enterprises, LLC f/k/a House of Cheatham, Inc.          | <ul> <li>☐ Africa's Best Herbal Intensive No-Lye Relaxer System</li> <li>☐ Originals by Africa's Best Originals Olive Oil Conditioning Relaxer</li> <li>☐ Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil</li> <li>☐ Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System</li> <li>☐ Organics by Africa's Best Kids Organic Conditioning Relaxer System</li> <li>☐ Organics by Africa's Best Kids Natural Conditioning Relaxer System</li> <li>☐ Texture My Way Men's Texturizing Kit</li> <li>☐ Texture My Way Women's Texturizing &amp; Softening System</li> <li>☐ Other (please specify):</li> </ul> |
| House of Cheatham, LLC  | <ul> <li>□ Africa's Best Herbal Intensive No-Lye Relaxer System</li> <li>□ Originals by Africa's Best Originals Olive Oil Conditioning Relaxer</li> <li>□ Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil</li> <li>□ Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System</li> <li>□ Organics by Africa's Best Kids Organic Conditioning Relaxer System</li> <li>□ Organics by Africa's Best Kids Natural Conditioning Relaxer System</li> <li>□ Texture My Way Men's Texturizing Kit</li> <li>□ Texture My Way Women's Texturizing &amp; Softening System</li> <li>□ Other (please specify):</li> </ul> |
| L'Oréal USA, Inc./ L'Oréal USA Products, Inc./ SoftSheen-Carson LLC | □ Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer □ Dark and Lovely Beautiful Beginnings No Mistake Curl Softener □ Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer □ Dark and Lovely Triple Nourished Silkening Relaxer □ Optimum Salon Haircare Defy Breakage No-Lye Relaxer  |

| Defendant              | Product List (Select All Applicable Products)                           |
|------------------------|---|
| L'Oréal USA, Inc./     | Optimum Salon Haircare Amla Legend Relaxer                              |
| L'Oréal USA            | Optimum Care Bodifying Relaxer  |
| Products, Inc./        | Optimum Multi-Mineral Reduced pH Crème Relaxer                          |
| SoftSheen-Carson       | Bantu No Base Relaxer   |
| LLC                    | Ultra Precise No-Lye Conditioning Relaxer                               |
|                        | Mizani Butter Blend Relaxer   |
|                        | Mizani Butter Blend Sensitive Scalp Rhelaxer                            |
|                        | <u> </u>  |
|                        | Mizani Butterblend Prosolvent Relaxer                                   |
|                        | Mizani Classic Rhelaxer   |
|                        | Mizani Sensitive Scalp Rhelaxer   |
|                        | Care Free Curl – Cold Wave Chemical Rearranger Super Strength           |
|                        | Look of Radiance Permanent Crème Relaxer Kit                            |
|                        | Other (please specify):   |
|                        |   |
| <b>Luster Products</b> | Luster's Pink Oil Moisturizer No-Lye Conditioning Relaxer               |
| Company                | Luster's Pink Oil Moisturizer Short Looks Texturizer                    |
|                        | Luster's Pink Oil Moisturizer Smooth Touch Relaxer                      |
|                        | PCJ Kit   |
|                        | PCJ No Lye Kit - Adult  |
|                        | PCJ No Lye Kit - Children's   |
|                        | ShortLooks Colorlaxer Diamond Black                                     |
|                        |   |
|                        | ShortLooks Colorlaxer Passion Red                                       |
|                        | ShortLooks Colorlaxer Sable Brown                                       |
|                        | Other (please specify):   |
| MaDrida Dagaayah       | Design Essentials Honey Nectar Relaxer Kit - Time Release Regular       |
| McBride Research       | Strength  |
| <u>Laboratories</u>    | Design Essentials Sensitive Scalp Relaxer System                        |
|                        | `   |
|                        | Design Essentials Regular Conditioning Relaxer                          |
|                        | ☐ Other (please specify):   |
| Namaste Laboratories   | ORS Olive Oil Built-In-Protection No-Lye Relaxer – Full Application     |
| Tramaste Laboratories  | ORS Olive Oil No-Mix Salon Formula Crème Relaxer                        |
|                        | ORS Olive Oil Ultra Nourish Crème Hair Relaxer                          |
|                        |   |
|                        | ORS Olive Oil Built-In-Protection No-Lye Relaxer – New Growth           |
|                        | ORS Olive Oil Zone Relaxer – Targeted Touch-Up No-Lye Hair Relaxer      |
|                        |   |
|                        | ORS Olive Oil Curl Stretching Texturizer                                |
|                        | ORS Olive Oil Crème on Crème Touch-Up No-Lye Hair Relaxer               |
|                        | ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical                |
|                        | ORS Olive Oil Texlax and Stretch Semi-Straightening System              |
|                        | ☐ ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair |
|                        | Relaxer System  |

| Defendant   | Product List (Select All Applicable Products)   |
|---|---|
| Namaste Laboratories  | ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening   |
|   | System  ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Shield ORS Olive Oil Professional No-Lye Relaxer Kit ORS Olive Oil Professional Crème Relaxer Namasté Salon System Triple Emulsion Relaxer Namasté Salon System Crème Relaxer Namasté Salon System Conditioning Sensitive Scalp No-Lye Relaxer Namasté Salon System Crème Relaxer Salon Trial Pack Other (please specify):  |
| Revlon, Inc./ Revlon Consumer Products Corporation/ Revlon Group Holdings LLC/ Revlon | African Pride – No Lye Relaxer Kit African Pride – No Base Relaxer African Pride – Multi Length Texturizer Kit African Pride – Dream Kids No Lye Relaxer Kit African Pride – Dream Kids No Lye Relaxer Kit African Pride – Dream Kids No Lye Relaxer Kit African Pride – Dream Kids No Lye Relaxer Kit African Pride – Dream Kids No Lye Relaxer Kit African Pride – No Lye Conditioning Crème Relaxer Kit African Pride – No Lye Conditioning Crème Relaxer Kit Crème Of Nature Relaxer Cream Crème of Nature Herbarich Conditioning Crème Relaxer System Kit Crème of Nature Herbarich No Base Relaxer Crème of Nature Herbarich No Base Relaxer Crème of Nature No Base Relaxer Crème of Nature No Lye Relaxer Crème of Nature Sodium Relaxer Kit Crème Of Nature Cni No Lye Relaxer Crème Of Nature Eden Relaxer Fabulaxer No-Lye Relaxer Fabulaxer Ro-17 Revlon Realistic No-Base Relaxer Revlon Realistic No-Base Relaxer Revlon Realistic No Lye Relaxer Kit Other (please specify): |
| Strength of Nature, LLC   | African Pride Olive Miracle Deep Conditioning Crème-on-Crème No Lye Relaxer 8 Salon Pack Touch-Ups  African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer  African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner  African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application  |

| Defendant           | Product List (Select All Applicable Products)  |
|---------------------|--|
| Strength of Nature, | African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One                    |
| LLC                 | Complete Touch-Up  |
|                     | African Pride Shea Miracle Texture Softening Elongating System                       |
|                     | African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit                      |
|                     | African Pride Dream Kids Olive Miracle Relaxer                                       |
|                     | African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit                          |
|                     | Dr. Miracle's No Lye Relaxer Kit   |
|                     | Dr. Miracle's New Growth No-Lye Relaxer Kit  |
|                     | Elasta QP Normal Relaxer Kit   |
|                     | Elasta QP Normal Relaxer Kit 2 Applications  |
|                     | Elasta QP Resistant Relaxer Kit  |
|                     | Elasta QP Sensitive Scalp Kit 12 Application Economy Pack                            |
|                     | Elasta QP Sensitive Scalp Kit – 4 Applications                                       |
|                     | Elasta QP No Base Crème Relaxer  |
|                     | Elasta QP SOY OYL No-Base Relaxer  |
|                     | Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit                      |
|                     | Elasta QP No-Base Relaxer  |
|                     | Elasta QP Extra Body No-Base Regular Relaxer   |
|                     | Elasta QP Extra Body No-Base Super Relaxer   |
|                     | Gentle Treatment No-Lye Relaxer Gray Kit   |
|                     | Gentle Treatment No-Lye Relaxer  |
|                     | Just For Me Relaxer 1 Complete Touch Up Relaxer                                      |
|                     | Just For Me 4 Application Salon Pack Relaxer   |
|                     | Just For Me No-Lye Conditioning Crème Relaxer Kit                                    |
|                     | Just For Me No-Lye Conditioning Crème Relaxer Kit with Coil & Curl                   |
|                     | Cream  |
|                     | Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturize Lotion |
|                     | ☐ Just For Me No-Lye Texture Softener System   |
|                     | Just For Me No-Lye Texture Softener System with Hair & Scalp Butter                  |
|                     | Motions Classic Formula Smooth & Silken Hair Relaxer                                 |
|                     | Motions Professional 12-Application Salon Pack                                       |
|                     | Motions Silkening Shine No Lye Relaxer Kit   |
|                     | Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up                           |
|                     | Application  |
|                     | Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch                     |
|                     | Up Application   |
|                     | ☐ Profectiv Procision Relaxer Kit Regular  |
|                     | ☐ Profectiv Relax and Refresh Kit Auburn Spice                                       |
|                     | ☐ Profectiv Relax and Refresh Kit Cherry Fusion                                      |
|                     | Profectiv Relax and Refresh Kit Jet Black  |
|                     | Profectiv Relax and Refresh Kit Mahogany Brown                                       |
|                     | Profectiv Relax and Refresh Kit Silky Black  |

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| Defendant               | Product List (Select All Applicable Products)  |
|-------------------------|--|
| Strength of Nature, LLC | <ul> <li>□ Pro-Line Comb Thru Texturizer Kit</li> <li>□ SmartPerm No-Lye Anti-Breakage Relaxer System</li> <li>□ SmartPerm No-Lye Anti-Breakage New Growth Relaxer System, Smart Grow Stimulator</li> <li>□ SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit, 4         Applications</li> <li>□ Smart Perm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications</li> <li>□ S&amp;B® Botanicals™ 2 Application Relaxer</li> <li>□ S&amp;B® Botanicals™ No-Lye Sensitive Scalp Relaxer, 1-App</li> <li>□ S&amp;B® Botanicals™ No-Mix Texturizer 2-App, with Deep Conditioner</li> <li>□ S&amp;B® Botanicals™ Relaxer 8-Touch Up</li> <li>□ Soft &amp; Beautiful No-Lye Crème Relaxer</li> <li>□ Soft &amp; Beautiful No-Lye Ultimate Conditioning Relaxer System</li> <li>□ TCB Naturals Conditioning Argan Oil Vitamin E &amp; Olive No-Lye Relaxer</li> <li>□ TCB Naturals Conditioning Argan Oil Vitamin E &amp; Olive No-Lye Relaxer, 2 Applications</li> <li>□ TCB No-Base Crème Hair Relaxer with Protein &amp; DNA</li> <li>□ UltraSheen Supreme Conditioning No-Lye Relaxer</li> <li>□ UltraSheen Ultra Moisturizing No-Lye Relaxer</li> <li>□ UltraSheen Ultra Moisturizing No-Lye Relaxer, with Keratin</li> <li>□ Other (please specify):</li> </ul> |
| Dudle                   | manufacturer(s)/product(s) used by Plaintiff not identified above: y Beauty Corp., LLC f/k/a Dudley Products, Inc Dudley's No Base nent Creme Relaxer  |
| 8. Plainti              | ff's use of Defendant(s) hair relaxer product(s) caused serious injuries and   |
| damages including bu    | nt not limited to the following:   |
| ☑ Endon<br>□ Ovaria     | e Cancer<br>netrial Cancer<br>an Cancer<br>injuries and/or additional details (please specify):  |

9. Approximate date(s) of diagnosis (injury(ies)), if applicable at this time, that form(s) the basis of Plaintiff's claim(s):

Endometrial Cancer - 11-15-2022

## CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND INCORPORATED IN THIS LAWSUIT

- 10. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth fully herein, all common factual allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060.
- 11. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:
  - ✓ Count I Negligence and/or Gross Negligence
  - ✓ Count II Negligent Misrepresentation
  - ✓ Count III Negligence *Per Se*
  - ✓ Count IV Strict Liability: Design Defect
  - Count V Strict Liability: Failure to Warn
  - Count VI Breach of Implied Warranty of Merchantability/ Fitness for a Particular Use
  - Count VII Breach of Express Warranty under state law and the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 et seq.

| V               | Count VIII – Fraud/ Fraudulent Misrepresentation  |
|-----------------|---|
| <b>✓</b>        | Count IX – Fraudulent Concealment   |
| <b>V</b>        | Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims |
| <b>/</b>        | Count XI – Unjust Enrichment  |
|                 | Count XII – Wrongful Death  |
|                 | Count XIII – Survival Action  |
|                 | Count XIV – Loss of Consortium  |
| <b>/</b>        | Count XV – Punitive Damages   |
|                 | Other Causes of Action:   |
| 12<br>damages f | . <u>Consortium Claim(s) (if applicable)</u> : The following individual(s) allege(s) for loss of consortium:    |
| 13 individual   |   |
|                 |   |

## **JURY DEMAND**

Plaintiff(s) demand(s) a trial by jury as to all claims in this action.

Dated this the 20th day of May , 20 25.

RESPECTFULLY SUBMITTED ON BEHALF OF THE PLAINTIFF(S),

/s/ Rebecca King

Rebecca King Keller Postman LLC 150 N. Riverside Plaza Suite 4100 Chicago, IL 60606 312-741-5220 rebecca.king@kellerpostman.com hairrelaxers@kellerpostman.com